

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

THOMAS H. BATES	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. CIV-21-705-JD
STATE FARM FIRE AND	)	
CASUALTY COMPANY,	)	
	)	
Defendant.	)	

**DEFENDANT STATE FARM FIRE AND CASUALTY COMPANY’S  
EXHIBIT LIST**

Pursuant to the Court’s Scheduling Order (Doc. 14), Defendant State Farm Fire and Casualty Company (“State Farm”), submits the following list of exhibits that it may offer into evidence at trial. State Farm reserves the right to amend or supplement this list of potential trial exhibits. By listing a potential exhibit or category of exhibits, State Farm does not waive any objection to the introduction or use of the exhibit by any other party in any hearing or at the trial of this action. or use of the exhibit by any other party in any hearing or at the trial of this action.

Discovery is ongoing, and State Farm reserves the right to modify, delete, add to, and revise the referenced exhibits, which are based on present knowledge only.

No.	Description	Bates Label	Will/May
1.	Certified Policy Record and Renewal (07/07/2021)	SF.BATES_000001– SF.BATES_000031	Will
2.	Fire Claim File Print	SF.BATES_000033–	May

	General Information	SF.BATES_000043	
3.	Fire Claim File Print Injury Information	SF.BATES_000044	May
4.	Fire Claim File Print Financial Information	SF.BATES_000045	May
5.	Fire Claim File Print File History Information	SF.BATES_000046– SF.BATES_000077	May
6.	Document List Details Report	SF.BATES_000078-000112	
7.	Tresa Dunnican-Jacome letter with estimate and payment (02/23/2021)	SF.BATES_000113– SF.BATES_000114	Will
8.	Letter from State Farm - Loss Report Received (02/04/2021)	SF.BATES_000115	May
9.	Letter from State Farm to Oklahoma Department of Insurance (04/15/2021)	SF.BATES_000141– SF.BATES_000142	May
10.	Email from State Farm with partial denial attached (03/15/2021)	SF.BATES_000143– SF.BATES_000148	Will
11.	Accuweather Hail Report	SF.BATES_000149-152	May
12.	Audit Reports	SF.BATES_000165– SF.BATES_000182	May
13.	Draft Estimate (04/21/2021)	SF.BATES_000183– SF.BATES_000193	May
14.	Draft Estimate (04/12/2021)	SF.BATES_000194– SF.BATES_000204	May
15.	Draft Estimate (02/23/2021)	SF.BATES_000205– SF.BATES_000215	May
16.	Price List Variation Reports	SF.BATES_000216– SF.BATES_000218	May
17.	Labor and Materials Reports	SF.BATES_000219– SF.BATES_000230	May
18.	Dwelling Sketches	SF.BATES_000231– SF.BATES_000234; SF.BATES_000262– SF.BATES_000263	Will
19.	ClaimsReady Report (06/19/2012)	SF.BATES_000235– SF.BATES_000247	May

20.	ClaimsReady Report (02/05/2021)	SF.BATES_000248– SF.BATES_000261	Will
21.	Estimate Change Reports	SF.BATES_000264– SF.BATES_000265	May
22.	Emails from Gary Bates with attachments	SF.BATES_000266– SF.BATES_000287	May
23.	Email from Jonathan Marks about second inspection with attachments (03/10/2021)	SF.BATES_000288– SF.BATES_000299	May
24.	State Farm estimate (04/12/2021)	SF.BATES_000300– SF.BATES_000306	Will
25.	State Farm estimate with photos of property (02/23/2021)	SF.BATES_000307– SF.BATES_000366	Will
26.	State Farm Operation Guides	BATE00000001PROD- 00000008PROD-00000011PROD-, 00000013PROD-00000022PROD, 00000024PROD-00000071PROD, 00000074PROD-00000299PROD,	May
27.	State Farm Operation Guides Preface and Commitment to Policyholders	BATE00000023PROD, BATE00000072PROD- 00000073PROD,	May
28.	State Farm Standard Claims Procedures	BATE00000300PROD- 00000462PROD, 00000471PROD- 00000625PROD, 00000646PROD- 00000815PROD, 00000836PROD- 00001006PROD	May
29.	State Farm Jurisdictional References	BATE00000463PROD-470PROD, 00000626PROD-00000645PROD, 00000816PROD-00000835PROD,	May
30.	Accuweather Report	Aegis Roofing_000001-000003	May
31.	Photos of the property taken and produced by Aegis Roofing	Aegis_000006– Aegis_000072; Aegis_000099– Aegis_000107	May
32.	Text messages between Jonathan Marks and Gary Bates about the property	Aegis_000077– Aegis_000091; BATES_0191– BATES_0198	May
33.	Text messages between Gary Bates, Marian Bates, and Jonathan	Aegis_000092– Aegis_000094; BATES_0183– BATES_0186	May

	Marks about the property		
34.	Aegis Roofing file on Thomas Bates	Aegis_000114– Aegis_0000118	May
35.	Text messages and photo attachments	BATE00001589PROD- BATE00001597PROD	May
36.	Aegis Roofing estimate	BATES_0132– BATES_0135	May
37.	Email correspondence between Gary Bates and Shari Bivens	Bates 0145-0147	May
38.	Aegis Roofing estimate (01/28/13)	BATES_0159	May
39.	Gary Bates email to Shari Bivens at State Farm (04/02/21)	BATES_0160	May
40.	Email from Gary Bates to State Farm about claim (04/21/2021)	BATES_0162	May
41.	Email between Jonathan Marks and Marian Bates with threaded email from Shari Bivens attached (06/10/2021)	BATES_0170– BATES_0171	May
42.	OID response to Plaintiff (04/20/2021)	BATES_0179	May
43.	Text messages between Marian Bates and Jonathan Marks	BATES_0202– BATES_0209	May
44.	Plaintiffs’ responses to written discovery		May
45.	Documents produced by Plaintiffs in discovery and not objected to by State Farm.		May
46.	Documents utilized in any depositions not objected to by State Farm.		May
47.	Exhibits listed by Plaintiffs and not objected to by State Farm.		May
48.	Exhibits identified in		May

	answers to interrogatories and not objected to by State Farm.		
49.	Additional documents produced in discovery and not objected to by State Farm.		May
50.	Charts or enlargements of any party's exhibits not objected to by State Farm.		May
51.	All expert witness Curriculum Vitae and reports		May
52.	Demonstrative aids, illustrative exhibits, visual aids, charts, graphs, summaries of voluminous documents, and chronologies not objected to by State Farm.		May
53.	Additional exhibits identified in discovery, which is ongoing.		May
54.	All documents needed for purposes of rebuttal.		May
55.	All documents needed for purposes of impeachment.		May

Respectfully submitted,

/s/ Paula M. Williams

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***Attorneys for Defendant,  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 5, 2022, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following:

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